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Counsel for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON – PORTLAND DIVISION

AUBREY CLARK JR.,

Plaintiff,

-against-

CITY OF ST. HELENS; OFFICER ANTHONY J.
BOSWELL; SERGEANT EVIN V. EUSTICE;
OFFICER DYLAN J. GASTON; SERGEANT JOSE H.
CASTIJELLA, III; JOHN DOE 1 (Columbia County
District Attorney); JOHN DOE 2 (Columbia County
Deputy District Attorney); and JANE DOE 1 (Victim's
Advocate, Columbia County DA's Office),

Defendants.

Case No. 3:20-cv-1723

**UNOPPOSED MOTION TO
WITHDRAW AS ATTORNEY
OF RECORD AND OPPOSED
MOTION TO EXTEND
PRETRIAL DEADLINES**

Pursuant to Local Rule 83-11(a), DR 2-110(C)(1)(d) and(C)(6), and ORPC 1.16(b)(1), (b)(2), (b)(5) and (b)(7), Thomas Freedman, attorney for plaintiff herein, moves the court for an order allowing his withdrawal as attorney of record in the above-entitled matter. Plaintiff's contact information will be provided to the Court and the parties separately. This motion is not made for the purposes of harassment or delay.

Defense counsel has indicated that defendants do not oppose undersigned counsel withdrawing from this case. No new attorney is being substituted at this time. Trial is

currently scheduled for March 1, 2022. Current counsel intends to fully cooperate with any new counsel to ease any transition of the case.

In order to protect plaintiff's rights, undersigned counsel also moves for a 60-day extension of all pretrial deadlines. Defendants oppose any further extension of the pretrial deadlines.

If the Court requires more information, undersigned counsel will file a supplemental declaration under seal.

Dated: July 12, 2021

Respectfully submitted,

By: *thomas freedman*
Thomas Freedman (OSB No. 080697)
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Counsel for Plaintiff